

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**REQUEST:** AT&T Communications of New England, Set #4

**DATED:** October 24, 2001

**ITEM:** ATT-VZ 4-21 For each report dimension and service disaggregation indicated in Instruction 13 and utilizing the time period specified in Instruction 9, state for each month:

- (a) the number of installation trouble reports received; and
- (b) the amount of credits or payments issued to the various categories of customers.

**SUPPLEMENTAL  
REPLY:** Attached is the relevant reply filed in D.T.E. 01-34 on November 30, 2001.

VZ # 185S

Attachment  
ATT-VZ 4-21  
VZ #185S

**Verizon New England Inc.  
D/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-34**

**Respondent:** Nancy McFeeley

**Title:** Vice President

**Respondent:** Larry Umland

**Title:** Manager – Performance  
Assurance

**REQUEST:** WorldCom & AT&T Communications of New England, Inc., Set #1

**DATED:** October 17, 2001

**ITEM:** WCOM/ATT 1-22 For each report dimension and service disaggregation indicated in Instruction 13 and utilizing the time period specified in Instruction 9, state for each month:

- (a) the number of installation trouble reports received; and
- (b) the amount of credits or payments issued to the various categories of customers.

**REPLY:**

- a) The attached spreadsheet contains the available data from January through October 2001 on an interstate and intrastate basis for special access (wholesale) and special services (retail) provided by Verizon MA. The interstate wholesale and retail data relate to services provided under FCC Tariff No. 11. The intrastate wholesale data relate to services provided under DTE Tariff No. 15, and the intrastate retail data relate to services provided under DTE Tariff No. 10. Verizon cannot differentiate the retail data by type of customer (*e.g.*, end user, affiliated carriers, non-affiliated carriers). The retail special services data is provided from the same database underlying Verizon's Carrier-to-Carrier reports, excluding disconnects, test orders, administrative orders, and records only orders, in accordance with the parameters of the above request.

**REPLY:** WCOM/ATT 1-22  
(cont'd)

- b) Verizon MA objects to this request on the grounds that it is overly broad and unduly burdensome and seeks information that is irrelevant, immaterial and beyond the scope of this proceeding. Verizon MA further objects on the grounds that the request is not reasonably calculated to lead to the discovery of admissible evidence because the revenue data sought is not relevant to assessing Verizon MA's intrastate special access service performance and the time period requested (*i.e.*, 1998 to present) exceeds the study period established by the Department in its March 14, 2001, Order and reflected in Verizon MA's Special Access Service reports filed on May 24, 2001, and September 7, 2001. Lastly, Verizon MA objects to providing information relating to its retail services, which are not at issue in this proceeding.

Without waiving its objections, Verizon MA responds as follows

The information requested is not available because Verizon MA's systems do not track credits or payments by installation trouble reports.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**REQUEST:** AT&T Communications of New England, Set #4

**DATED:** October 24, 2001

**ITEM:** ATT-VZ 4-23 For each report dimension and service disaggregation indicated in Instruction 13 and utilizing the time period specified in Instruction 9, state for each month:

- (a) the number of trouble reports after new installations; and
- (b) the amount of credits or payments issued to the various categories of customers.

**SUPPLEMENTAL  
REPLY:** Attached is the relevant reply filed in D.T.E. 01-34 on November 30, 2001.

VZ # 187S

**Verizon New England Inc.  
D/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-34**

**Respondent:** Nancy McFeeley  
Larry Umland  
**Title:** Vice President  
Manager – Performance  
Assurance

**REQUEST:** WorldCom & AT&T Communications of New England, Inc., Set #1

**DATED:** October 17, 2001

**ITEM:** WCOM/ATT 1-24 For each report dimension and service disaggregation indicated in Instruction 13 and utilizing the time period specified in Instruction 9, state for each month:

- (a) the number of trouble reports after new installations; and
- (b) the amount of credits or payments issued to the various categories of customers.

**REPLY:** See Verizon MA's Reply to WCOM/ATT 1-22. The data contained in that Reply includes trouble reports following new installations.

**Verizon New England Inc.  
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**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**Respondent:** John Conroy  
**Title:** Vice President Regulatory,  
Massachusetts

**REQUEST:** AT&T Communications of New England, Set #5

**DATED:** November 21, 2001

**ITEM:** ATT-VZ 5-1 Please state whether Verizon reports to the FCC for purposes of the FCC Report on Local Telephone Competition by the methodology included in the instructions for completing an FCC Form 447 (attached as Exhibit A to the Supplemental Surrebuttal of Deborah S. Waldbaum). If Verizon uses a different methodology, please state:

- how Verizon's methodology for reporting to the FCC for purposes of the FCC Report on Local Telephone Competition differs from the methodology included in the instructions for completing an FCC Form 447 (attached as Exhibit A to the Supplemental Surrebuttal of Deborah S. Waldbaum);
- of the two methodologies listed in (a) above, please state which methodology is likely to produce a higher count and explain your reasoning; and
- by what order of magnitude and/or by what percentage the methodology provided in response to (b) above produces a higher count.

Please explain your answer and cite to and provide copies of all documentation that support your answer.

**REPLY:** Exhibit A to the Supplemental Surrebuttal of Deborah S. Waldbaum includes FCC Form 477, not FCC Form 447.

Verizon files FCC Form 477 with the FCC, and complies with the instructions for completing FCC Form 477.

**Verizon New England Inc.  
D/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts  
D.T.E. 01-31**

**Respondent:** John Conroy  
**Title:** Vice President Regulatory,  
Massachusetts

**REQUEST:** AT&T Communications of New England, Set #5

**DATED:** November 21, 2001

**ITEM:** ATT-VZ 5-2 Please state whether Verizon reported its retail lines in the Massachusetts Competitive Profile by the methodology included in the instructions for completing a FCC Form 447 (attached as Exhibit A to the Supplemental Surrebuttal of Deborah S. Waldbaum). If Verizon used a different methodology, please state:

- a. how Verizon's methodology for reporting its retail lines in the Massachusetts Competitive Profile differs from the methodology included in the instructions for completing an FCC Form 447 (attached as Exhibit A to the Supplemental Surrebuttal of Deborah S. Waldbaum);
- b. of the two methodologies listed in (a) above, please state which methodology is likely to produce a higher count and explain your reasoning; and
- c. by what order of magnitude and/or by what percentage the methodology provided in response to (b) above produces a higher count.

**REPLY:** Exhibit A to the Supplemental Surrebuttal of Deborah S. Waldbaum includes FCC Form 477, not FCC Form 447.

The methodology utilized by Verizon MA to report its retail lines in the Massachusetts Competitive Profile differs slightly from the methodology used in completing FCC Form 477. The FCC report contains a count of ISDN circuits while the Competitive Profile contains a count of voice grade equivalent retail lines associated with those ISDN circuits. Therefore, the Competitive Profile contains approximately 110,000 more retail lines than the FCC Form 477 Report.